

Board of Trustees
Clint Carthel
Lela Taubert
Joe Stokes
Marilyn Koelder
Shane Berry
Troy Burnett
Richard Walden

COTTON CENTER ISD

P.O. Box 100

Rocky J. Stone, Superintendent
Andrew Hannon, Principal

Ph. 806 879-2160
fax 806 879-2175

www.cottoncenterisd.org

April 25, 2012

Received & Inspected

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

MAY - 1 2012

FCC Mail Room

In the Matter of)

Lifeline and Link Up Reform and)
Modernization)

WC Docket No. 11-42

Lifeline and Link Up)

WC Docket No. 08-109

Federal-State Joint Board on)
Universal Service)

CC Docket No. 96-45

Advancing Broadband Availability)
Through Digital Literacy Training)

WC Docket No. 12-23

Dear Sir/Madame:

I am writing today in response to the FCC's Notice of Proposed Rulemaking which, among other things, proposes a Digital Literacy Pilot to fund schools and libraries operating digital literacy training courses. Before delving into my response to the proposed pilot, I want to first thank the FCC for your continued support for the E-Rate program. The E-Rate program provides critical discounts to assist schools (like mine) to obtain affordable telecommunications and internet access.

Cotton Center ISD is a very small rural school serving 130 students in an area of high poverty level (73% Free/Reduced). The District has used E-Rate funds to upgrade our communications network and will continue to utilize the funds to support our rural community students. Without the E-Rate funds we would not be able to support our access to the world. Most of our students do not have the opportunity to access the world other than our network. It is vital that we continue this help and not erode those funds for other purposes.

The pilot would provide grants to K-12 schools and libraries, lasting four years, to hire trainers, conduct training courses and provide

No. of Copies rec'd 0
List ABCDE

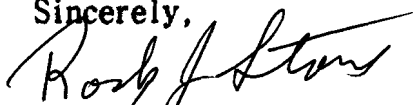
resources/materials to those who lack digital literacy skills. While the FCC does not propose to fund the pilot using E-Rate funds, it does propose implementing and administering the program through the same division that oversees the E-Rate program. Specifically, the FCC proposes implementing/administering the program through the Schools & Libraries Division of the Universal Service Administrative Company (USAC).

I am concerned that operating the pilot through E-Rate will undermine the important and ongoing work of E-Rate, causing delays in the program's application and appeal processes, creating auditing problems and results in problematic precedents for E-Rate's eligible services. Specifically, I oppose the proposal to operate/administer the proposed pilot through the E-Rate program.

I strongly support the FCC's proposal that the pilot be funded through either the USF High Cost or Lifeline programs and not from the already oversubscribed E-rate program. The pilot should not be administered through the E-rate program. Running the pilot through the E-rate Program poses a host of legal and administrative concerns including the following: requiring changing the E-rate's Eligible Services List; adding services to the E-rate Eligible Services List that do not support telecommunications services, Internet access, or internal connections; burdening the processing of E-rate applications and appeals processes; and creating a very difficult audit situation. I oppose the running the Pilot funds through federal agencies that administer non-Universal Service Fund programs. I am concerned that doing so would establish a precedent for mixing USF funds with appropriated funds, possibly changing the legal character of universal service fund. The Schools and Libraries Division of the Universal Service Administrative Company is already back-logged with the amount of paperwork necessary and time required to go through the application approval and payment process. I have yet to be notified of my E-rate funding for the current year. I can only imagine what the timeline would be to have to administer another add-on program to this process.

Thank you for considering my response as you move forward with your decision on the Digital Literacy Pilot. I applaud the FCC for its continued efforts to protect the already oversubscribed E-Rate program by not funding the pilot with E-Rate funding. I urge you to take similar protective measures when it comes to the implementation and administration of the pilot. Please ensure that critical, limited E-Rate resources-both fiscal and administrative-are protected.

Sincerely,



Rocky J. Stone